

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

**RILEY AMORE; and CAROLINE  
PARKER,**

*individually and on behalf of all others  
similarly situated,*

**Plaintiffs,**

v.

**AMERICAN ASSOCIATION OF  
VETERINARY CLINICIANS; SOLUTION  
INNOVATIONS, INC.; VCA ANIMAL  
HOSPITALS, INC.; BLUEPEARL  
HOLDINGS, LLC; MEDVET  
ASSOCIATES, LLC; RED BANK  
VETERINARY HOSPITAL, P.C.;  
UNIVERSITY OF PENNSYLVANIA  
SCHOOL OF VETERINARY MEDICINE;  
CUMMINGS SCHOOL OF VETERINARY  
MEDICINE AT TUFTS UNIVERSITY;  
COLLEGE OF VETERINARY MEDICINE  
AT MIDWESTERN UNIVERSITY;  
NATIONAL VETERINARY ASSOCIATES,  
INC.; PIEPER-OLSON VETERINARY  
PARENT, LLC; PATHWAY VET  
ALLIANCE, LLC; THE ANIMAL  
MEDICAL CENTER, INC.,**

**Defendants.**

Case No. 7:25-cv-00229-EKD-CKM

**MOTION FOR PRO HAC VICE ADMISSION OF SEAN C. RUSSELL**

Petitioner Roman Lifson, Esq., an attorney admitted to practice in this Court and counsel of record in the instant proceeding, pursuant to Local General Rule 6(d), hereby moves for the *pro hac vice* admission of Sean C. Russell, Esq., to appear, associate, and participate as co-counsel on

behalf of Plaintiffs Riley Amore and Caroline Parker, individually and on behalf of all others similarly situated, in the above-styled case only, and to receive and make electronic filings in this case, and in support thereof state as follows:

1. Mr. Sean C. Russell is an attorney at the law firm:

SCOTT+SCOTT ATTORNEYS AT LAW  
600 W. Broadway  
Suite 3300  
San Diego, CA 92101  
(619) 233-4565

2. Mr. Sean C. Russell is neither qualified nor licensed to practice in the Commonwealth of Virginia.

3. Mr. Sean C. Russell is admitted to and a member in good standing of the bar of the State of California, No. CA 308962, and is qualified and licensed to practice before the United States District Court for the Southern District of California.

4. Mr. Sean C. Russell will promptly qualify for electronic case filing as required by Local Rule 6(d).

5. The Declaration of Mr. Sean C. Russell in support hereof is attached hereto and incorporated herein by reference.

6. A draft Order is also attached hereto and incorporated herein by reference.

WHEREFORE, I, Roman Lifson, Esq., respectfully move this Court to enter an Order permitting Mr. Sean C. Russell to appear *pro hac vice*, and participate as co-counsel on behalf of Plaintiffs Riley Amore and Caroline Parker, individually and on behalf of all others similarly situated, for all purposes relating to the proceedings in the above-styled case and directing the Clerk to provide notice of electronic filings to Sean C. Russell at [srussell@scott-scott.com](mailto:srussell@scott-scott.com).

Dated: April 18, 2025.

Respectfully submitted,

/s/ Roman Lifson

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\* Pro Hac Vice Application Forthcoming

*Counsel for Plaintiffs and the Proposed Class*